



State of California  
**Respiratory Care Board**  
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**Inquiry:** I am writing regarding the Scope of Practice dealing with TB tests. I am currently employed by a school district responsible for the TB testing in our district. I am aware RCP's are able to perform these tests. However, this district has a protocol in place for anaphylaxis post testing. This protocol requires 50mg Benadryl given IM and for respiratory distress to give Sub Q Epinephrine. My question is: are we covered through our Scope of Practice to carry out this protocol?

**Response :** Administration of medication by protocol for anaphylaxis treatment – Classification 1B. That is, it is not verbatim from the Respiratory Care Practice Act, but, in the Respiratory Care Board's judgment, highly inferred and allowed.

In addition to the classification listed above the intent of the practice act recognizes the existence of overlapping functions between physicians and surgeons, registered nurses, physical therapists, respiratory care practitioners, and other licensed health care personnel (3701, Article I, General Provisions). As such, the onus is on the employer to develop appropriate training and competencies that would provide this function in a manner that would be safe when administered to the public.

It should also be recognized that the use of such a protocol must be under the direct supervision of a medical director. As such, the board would encourage the school district to ensure they are in compliance with any regulatory agencies that govern this practice. Even though they are not a licensed health facility this practice still mandates compliance with the appropriate agencies.

Reference # 2001\_C\_38